

1 SHEPPARD MULLIN RICHTER & HAMPTON LLP

A Limited Liability Partnership

2 Including Professional Corporations

CHARLES S. DONOVAN, Cal. Bar No. 103667

3 AMY B. NORRIS, Cal. Bar No. 201147

MORGAN P. FORSEY, Cal. Bar No. 241207

4 Four Embarcadero Center, 17th Floor

San Francisco, California 94111-4106

5 Telephone: 415-434-9100

Facsimile: 415-434-3947

6 Email: [cdonovan@sheppardmullin.com](mailto:cdonovan@sheppardmullin.com)

7 Attorneys for Plaintiff Baydelta Maritime Inc.

8 VENARDI ELAM LLP

MARK VENARDI (Cal. Bar No. 173140)

9 2033 N Main St Ste 750

Walnut Creek, CA 94596

10 Telephone: 925-937-3900

Facsimile: 925-937-3905

11 Email: [mark@vefirm.com](mailto:mark@vefirm.com)

12 Attorneys for Defendant and Counterclaimant Hal  
Eltzroth

14 LEONARD CARDER LLP

BETH A. ROSS (Cal. Bar No. 141337)

15 ELEANOR MORTON (Cal. Bar No. 220407)

1188 Franklin Street, Suite 201

16 San Francisco, CA 94109

Telephone: 415-771-6400

17 Facsimile: 415-771-7010

Email: [emorton@leonardcarder.com](mailto:emorton@leonardcarder.com)

18 Attorneys for Counter Defendant International  
19 Organization of Masters Mates & Pilots

20 UNITED STATES DISTRICT COURT

21 NORTHERN DISTRICT OF CALIFORNIA

23 BAYDELTA MARITIME INC.,

24 Plaintiff,

25 v.

26 HAL ELTZROTH,

27 Defendant.

Case No. C-06-1114 MMC

**STIPULATION AND [PROPOSED]  
ORDER TO CONTINUE STATUS  
CONFERENCE**

1 ...and RELATED COUNTERCLAIM.  
2

3  
4 The parties, by and through their respective counsel of record, request a  
5 continuance of the Status Conference presently scheduled for March 23, 2007 at 10:30  
6 a.m.

7 The parties have settled the matter, and are presently finalizing a settlement  
8 agreement. BayDelta and MMP have already executed the settlement agreement. Counsel  
9 for Eltzroth anticipates having the settlement agreement executed by March 27, 2007. The  
10 parties anticipate having a request for dismissal on file by April 3, 2007.

11 For the foregoing reasons, the parties request the Court continue the Status  
12 Conference to a date after April 3, 2007.

13  
14 Dated: March 19, 2007

15 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

16  
17 By /s/Amy Norris

18 AMY B. NORRIS  
19 Attorneys for Plaintiff and Counter-Defendant  
20 Baydelta Maritime Inc.

21 Dated: March 19, 2007

22 VENARDI ELAM LLP

23  
24 By /s/Mark Venardi

25 MARK VENARDI  
26 Attorneys for Defendant and Counter-Claimant,  
27 Hal Eltzroth  
28

1 Dated: March 19, 2007

2  
3 LEONARD CARDER LLP

4  
5 By /s/Eleanor Morton

6 ELEANOR MORTON  
7 Attorneys for Counter-Defendant International  
8 Organization of Masters Mates & Pilots  
9

10 ~~[PROPOSED]~~ ORDER

11 IT IS HEREBY ORDERED that the Status Conference scheduled for March  
12 23, 2007 is continued until April 27, 2007 at 10:30 a.m.. A Joint Status Conference  
13 Statement shall be filed no later than April 20, 2007.

14 SO ORDERED.

15 Dated: March 19, 2007

16 

17 Hon. Maxine Chesney  
18 United States District Judge  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28